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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
The Portals  
445 Twelfth Street S.W.  
Washington, D.C. 20554

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| In the Matter of        | ( | MM 99-25 |
| Creation of a           | ( | RM-9208; |
| Low Power Radio Service | ( | RM-9242  |

REPLY COMMENTS OF JOHN NATHAN ANDERSON

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## I. INTRODUCTION

I would first like to thank the Commission for giving this proposal so much of its time and effort. It has been heartening to see MM 99-25 on such a speedy track; 'speedy' being a relative term for a government agency.

Judging by the volume of public response you have received on this proposal, you should now be frightfully aware of shortcomings both within the current radio industry and, unfortunately, in your own operations. As of this writing, more than 3,100 comments and reply comments have been filed on MM 99-25 - with the overwhelming majority of them coming not from within the broadcast industry, but from the general public.

I am pleasantly surprised, though, to find others currently active in the industry who are publicly supportive of low power broadcasting; it was beginning to feel very lonely out here.

## II. AMENDMENT TO ORIGINAL COMMENTS

I would also like to take this opportunity to amend the original comments I filed on MM 99-25 with the Commission on August 2, 1999. In Section IV, Part B ('Technical Considerations - Relaxation of Channel Spacing'), I stated that the use of minimum distance separation to define available channels was an

"acceptable policy." Upon further review and study, I would like to rescind that portion and replace it with the following:

The use of minimum distance separation to define available channels for a low power FM radio service is NOT acceptable. By doing so, the Commission is effectively destroying the chances many markets might have to fit LPFM stations onto their dial. Instead, in addition to removing current second and third-channel interference policies, the Commission should also determine channel availability using the current interference contour protection methods for co-channel and first-adjacent channel stations. Because the signal 'footprint' of many LPFM stations will be so small, resorting to de facto minimum distance separation may be bureaucratically easier to apply and maintain, but will cut a significant portion of the United States listening public out of a service they deserve.

### III. UTILIZATION/PERFORMANCE OF FCC PUBLIC COMMENT FILING METHODS

I firmly believe that there would have been even more initial public comment filed on MM 99-25 if the FCC's Electronic Comment Filing System (ECFS) had been further tested and enhanced before being released for public use. I, myself, had to file my original comments multiple times before I could get 'the system' to accept them. Others never were able to file their original comments before the deadline, even though they had tried repeatedly.

FCC staff members have publicly admitted the response to MM 99-25 overwhelmed both their online and offline resources. This, in itself, is very telling - and it is something the Commission should seriously consider and rectify before undertaking another such publicly-demanded and controversial proposal in the future. If you cannot receive adequate input from the public on an issue, you cannot adequately do your job of shaping public communication policy. I urge the Commission to consider not only the failure of its public comment collection methods when ruling on MM 99-25, but the hundreds - if not thousands - of individuals who would have filed comments if they weren't rebuffed (even unintentionally) by the agency they wished to communicate with.

### IV. REPLY TO COMMENTS FROM THE 'STATE OF OREGON'

Frankly, as an American citizen of above-average intelligence, I am appalled beyond belief by the gall of Ernest T. Sanchez and Susan M. Jenkins to completely misappropriate the clout of an entire state in an attempt to gain more favor with the Commission as it considers MM 99-25.

Please be aware, if you are not already, that Mr. Sanchez and Ms. Jenkins were not and are not representing the views of the 'state of Oregon,' as they proclaim; they are attorneys on retainer to Oregon's Board of Higher Education, and, more specifically, concern themselves only with matters affecting one institution - Southern Oregon University. Their attempt to inflate their own importance not only takes a large amount of arrogance and gall, but was probably done without the knowledge of anyone in Oregon's state government who would have the legal authority to represent the state in such a way.

Therefore, Mr. Sanchez and Ms. Jenkins' behavior should be taken into close consideration as the Commission studies their comments. Because they are based on such a nefarious premise, I would urge that their comments either be discarded outright, or at least considered under the suspicion of how they were presented. Here's to hoping, one day, that the people of Oregon find out how two low-level legal eagles representing one college in the state attempted to sway federal policy through an outright charade abusing what little public authority they rightfully have in their positions.

### V. REPLY TO COMMENTS FROM THE NATIONAL ASSOCIATION OF BROADCASTERS ET AL.

#### A. The Wisconsin Angle

Not surprisingly, the National Association of Broadcasters (NAB) filed a mammoth 535-page Comment on MM 99-25, arrogantly discounting the proposal out of hand on both technical and legal grounds. Also, it was no shock to see many NAB member stations file individual comments in opposition to a legal low power

radio service. Attempting to refute the argument of the nation's most powerful lobbying group in Washington is a daunting task for one individual; hence, I will attempt to hit the 'high points' of the NAB's view on low power radio and hope the Commission will be able to see through the rest of the bombast.

It was pleasantly ironic to see comments in opposition to MM 99-25 filed by affiliates of the radio news network I work for (Wisconsin Radio Network). I find the missives from the General Managers/Vice Presidents of Racine Communications, WRDN (aka 'The Voice of the Chippewa Valley'), Cumulus Media, Journal Broadcast Group, Bliss Communications, WJMC, and Central Radio Group especially humorous, as they own one or more stations who are affiliates of our network - and who carry many of my own morning newscasts on their station or stations. It serves as a good example to the Commission that while some voices within the radio industry may speak more loudly on this proposal than others, the industry itself does not speak with one voice.

Just looking at input received from my home state, it's also apparent that some 'legal' broadcasters responded simply by regurgitating, word-for-word, entire sections of the NAB's 'LPFM Lobbying Kit.' Wisconsin Rapids Broadcasting, for example, sent the Commission a verbatim copy of the 'talking points' from the Kit, simply printed on its own letterhead. I hope the Commission also considers these comments for what they are and devotes more attention to the massive amount of one or two-sentence messages sent from ordinary citizens who, although they can't afford legal or political representation in Washington, were at least motivated enough by this proposal to at devote brain power sufficient to write something original to add to the debate.

However, I would like to single out one Wisconsin comment for special attention - that of WORT-FM, one of a handful of true community radio stations in the United States. WORT is one of the oldest in a woefully small category of station - a station run by and for members of the Madison, WI community which it serves. It is especially important to note that WORT wholeheartedly supports MM 99-25; because of its nature of being non-commercial and relying solely on fundraisers and donations to survive, it would conceivably seem that WORT is the type of station that could be most negatively impacted by the creation of a low power radio service.

Instead, the President of WORT's Board of Directors closes out her letter to the Commission with the words, "LPFM licensing is a powerful idea whose time has come...Please proceed carefully but, by all means, proceed." This flies in the face of the projections of economic destruction espoused by WORT's higher-financed colleagues in station clusters or broadcast groups. If the few truly community radio stations that do exist support this idea, then it should be clear to the Commission that the NAB's assertions of station closings and general adverse economic impact to the industry are at worst patently false or at best a pipe nightmare.

#### B. LPFM's Necessity and the Public Interest

Where does one begin? Let's start with the most glaring falsehood first: that an LPFM service is not needed in the United States. The NAB assumes that the Commission is acting on its own erroneous 'assumption' - that the number of voices with access to the airwaves has decreased since consolidation. In attempting to refute this, it points to the net increase in the number of radio formats being programmed on its member stations since the Telecommunications Act of 1996 was signed into law.

This is not a valid argument for refuting a loss of public access to radio stations. The increase in the number of formats has done only two things: It has eliminated some of the format overlap in some radio markets, and it has created new advertising niches to market to the general listening public. Neither of these developments mean overall public access has been increased, nor do they mean the current radio broadcast industry is better serving the public

interest. It has simply further segmented a pie wholly controlled by interests more inclined to make money than to adequately serve the communities they broadcast to. And it does nothing to explain the ever-growing trends of syndication and automation, which have eliminated thousands of on-air staff positions at local radio stations nationwide - literally removing thousands of voices from the airwaves.

Simply put, without the human resources available within the community or communities a station purports to serve, a station cannot serve at all.

It's telling that shortly after filing comments on MM 99-25, the NAB held its yearly summer Radio Show in Florida. One of the hot topics among the organized discussions that took place there involved the industry's problem of finding good 'new talent' for its member stations. The problem is an obvious one; there are far fewer opportunities for 'talent' at the local level, now that the vast majority of stations only feature live programming for about a third of their broadcast day. With consolidation, syndication and automation, the radio industry effectively 'laid off' two-thirds of its talent pool - and now it's wondering why it's having a hard time finding new people. Something does not compute.

#### C. Diversity

The NAB also cites its own research to back up its assertion that diversity of voices on the airwaves has not been harmed by consolidation - a study called "Independent Radio Voices in Radio Markets," published, coincidentally, in August 1999. The numbers, however, tell a significantly different story.

Since the wave of consolidation began, there has been a massive decimation of independent radio voices. The Clear Channel-AMFM merger has created a corporate entity with significant control over the radio programming currently available to the vast majority of the American listening public. This has only harmed the diversity of voices available in the United States. 700-plus radio stations under one thumb can't be wrong.

Looking at diversity from another perspective, the major conglomerates are manipulating the 'race card' for their own gain. As part of the Clear Channel-AMFM deal, the new company will have to sell off 107 stations to remain under the monopoly cap. Allegations within the industry have arisen - backed up by at least one trade publication - that Clear Channel identified and negotiated purchases with buyers before going through with the merger, and then presented a false facade of public posturing by pretending to openly solicit bids for those properties to be 'spun off.'

Clear Channel is not considering new bids on its stations, no matter what it says publicly. In fact, the company plans to spin off those properties to predominantly minority-owned and operated broadcast groups; while this may seem like a good thing, it's important to remember that Clear Channel had the opportunity to select which broadcast properties it could afford to lose - thereby shedding itself of its most 'undesirable' stations while effectively giving the scraps of the spectrum to a large group of the American public already disenfranchised by the radio industry. Not only does this smack of questionable ethics, but it also should come in a slap to the face of minorities nationwide. I hope Chairman William Kennard, as an African-American himself, can see Clear Channel's move for what it's worth.

#### D. 'Other Options' to LPFM

It is interesting to note that the NAB suggests that those who desire a low power radio service instead turn to the Internet as an alternate form to get their message out to the masses. Citing the growing availability of Internet access to the American public, the NAB effectively puts the Internet on the same level of traditional broadcast media. This is a far-fetched assumption, for two specific reasons.

The first is the method of access differential between the Internet and traditional broadcast media. 'Surfing the web' requires a much more significant investment in equipment by the person wishing to take part in online media. It is not possible to use the Internet without some sort of computer, and the cheapest of these sell for hundreds of dollars - not including the cost of Internet access. In comparison, it is possible to listen to radio with equipment costing less than \$10. The price inequality is also present at the transmission end; computers are needed to stream audio over the Internet, and the number of listeners possible for a 'cyber-station' is limited to the amount of bandwidth the station has available to it. Unlike RF electromagnetic energy, Internet bandwidth comes at a significant cost.

Despite the Commission's valiant efforts to increase Internet accessibility and affordability to the general public, coupled with its initiatives to spur development of a higher-bandwidth infrastructure, these goals have not yet been realized, and the amount of equipment and bandwidth necessary to make the same impact on a community as an LPFM station could accomplish remains very expensive.

On the other hand, putting together a 10-watt FM radio station comes with a much lower burden of cost, and the accessibility of its programming is limited only by the range of the station's signal. It is important to note that many supporters of LPFM are community and church groups, who do a lot of work with the disadvantaged in our society. The NAB is effectively telling those with the least means available to them that they instead of looking to a low power, low-cost method of mass communication, they should all invest in multiple T-1 lines and server clusters. It doesn't seem to make a lot of sense.

The second reason why the Internet cannot be considered an adequate alternative for a low power radio service is the comparison of quality between the two. I've recently been lucky enough to have Digital Subscriber Line (DSL) technology installed in my home. While this gives me the potential for listening to or viewing streaming media at speed of up to 768Kbits per second, the reality is much more disappointing. Often my streaming media connection will break up or 'stutter' because of Internet congestion somewhere between my computer and the server I'm trying to get the media from. And even when the connection is good, the quality of the audio is marginal at best - woefully lower than an FM radio signal.

Until the United States has an Internet infrastructure with an amount of bandwidth magnitudes greater than what is currently available to the average citizen, and until the equipment necessary for everyone to be online drops in price to a point comparable to the cheapest radio, streaming as a replacement for broadcasting is an idea that only works in rose-colored theory.

#### E. The Interference 'Problem'

Probably the most contentious issue of MM 99-25 are the questions of interference potential LPFM stations may present to existing broadcast operations. This is where the NAB hopes to score the most points with the Commission, who openly stated in the original proposal that it would approve no new service that would cause any detriment to existing broadcast facilities. If the NAB can prove that such a threat exists, it reasons, then the Commission must cease to consider such a service. Attached to its filing are the results of a 'receiver study' it conducted which shows, in a coincidentally conclusive fashion, that low power radio interference will scramble the FM band.

'Physics doesn't lie,' the NAB asserts. And, therefore, based on its analysis, low power radio cannot exist in harmony with 'traditional' radio stations. This is patently untrue, and the NAB knows it. That is why, in order to make physics support its argument, it manipulates the methodology of the science it conducted.

The first, and fatal, flaw in the NAB's study is it doctored the strengths of competitive signals the selected scrutinized receivers were tested with.

Ironically, the 'desired' (full-power) signal strength is a full 10 dBu less than the 'interfering' (LPFM) signal. Knowing full well that all FM receivers are designed to lock onto the stronger of two competing signals, the NAB stacked the deck to show that an LPFM station could crowd out a full-power station.

The second flaw is the spontaneous conclusion that today's radio receiver technology cannot handle stations spaced on second or third-adjacent channels. How this 'fact' is arrived at is not backed up by any outside - or objective - details. According to the NAB, today's receivers have no better signal discrimination capability than those manufactured more than 50 years ago - but gives no shred of evidence to back up this claim.

However, the NAB does deign to roll out 'old data' when it sees fit; another point in its interference argument reminds the Commission of how it had to revise its channel spacing rules three times over the past 50 years to maintain a 'clean' FM broadcast spectrum. The point is academic; this is not 1949, 1962 or 1983, nor are we dealing with the technologies associated with those times - and we are not dealing with a full-power FM radio service in this matter. While the concepts of interference are identical between the two, the impact of an LPFM station's signal on a full-power FM station's signal cannot be equally compared to the interference potential between two full-power stations occupying the same channel spacing.

In fact, real life tells an opposite tale. Commission Compliance and Information (now Enforcement) Bureau management and staff admit they simply do not have the resources necessary to silence the hundreds of unlicensed LPFM stations currently broadcasting in the United States. Of those that do get closed down, only a handful have been for interference concerns; most of those are for interference to television reception (TVI) or for using equipment that does not meet the spectral purity standards for responsible broadcasting. Neither of these would occur in a legal low power radio service, as type-accepted equipment and federally-approved engineering standards would apply.

Even among licensed broadcasters, there are some that continue to operate at LPFM power levels causing no interference problems. These are the 'grandfathered' Class-D stations, which are assigned power levels of 100 watts or less. In college, I was the General Manager of Valparaiso University's college station, WVUR, for two years. It is a grandfathered Class-D, at 36-watts ERP. It also exists less than 30 miles outside the Chicago metropolitan area - one of the most crowded spectrum spaces in the United States. To discount the NAB's interference assertions, the Commission only has to turn to its FM station database.

Finally, there is the matter of other receiver standards that have been conducted over the past few months, the most notable of which is the one done by the FCC itself, which draw conclusions exactly opposite from the NAB study. In the FCC study, as Chairman Kennard himself stated in "A New Tomorrowland," the speech to the NAB's summer radio conference, "our engineers found that all of the radios far exceeded the current interference protection standards for the third adjacent channel. And, all but two of these inexpensive radios exceeded the current interference protection standards for the second adjacent channel."

Granted, it was only one study; but when at least two other receiver studies submitted during this proceeding do not even come close to duplicating the 'problems' the NAB has found, there is significant evidence to consider the NAB study suspect. Physics only lies when the scientists are unethical and biased in their approach to studying it.

#### F. IBOC Concerns

The potential for LPFM's impact on the receivability of in-band on-channel (IBOC) digital radio is also another area of much hype from the NAB. Much of this rings hollow - there isn't enough data available on how separate IBOC signals interact with each other right now, much less for fabricating assertions on how IBOC would interact with LPFM.

The problem here isn't with LPFM - it is with IBOC. The system currently under development uses more spectrum bandwidth than analog radio transmissions, and results in a 'near CD-quality' signal. If I understand this correctly, this advancement in radio technology will not result in an appreciable difference in the quality of broadcast signal, while taking up more spectrum space. And this is an efficient use of the FM band?

There is a significant problem here; IBOC is simply not the right answer for bringing digital radio broadcasting to the United States. The rest of the world can't be wrong; The Eureka-147 DAB system not only provides better audio quality, but also has a higher incidence of receivability in technically challenging situations (like multipath). It also uses a completely different part of the spectrum. There is no reason America should be saddled with IBOC while the rest of the planet enjoys a superior digital radio service.

#### G. Contingency Plans

It astounds me that even with all the assertions the NAB has made that the radio industry is not an exclusive domain of the rich, or that LPFM will destroy radio's viability, it still felt the necessity to make alternate plans to fight this proposal if - or more hopefully, when - it becomes policy.

The first 'shot over the bow' in the NAB's war against LPFM is the challenge to the proposal's legality by invoking particulars of the Telecommunications Act of 1996. The Commission is considering (and rightly so) severe ownership restrictions on potential LPFM stations, potentially prohibiting current license holders from participating in the service. According to the NAB, this would be illegal under the Act, which makes no such ownership distinctions. However, this is only half-plausible; the Act was not written with LPFM in mind, and the goals it would attempt to realize. Therefore, there may be potential legal loopholes within the Act that would allow the Commission to fulfill its desire for ownership restrictions; I strongly urge the Commission to fervently investigate this matter.

The second tactic is the NAB's apparent preparation to stonewall the implementation of a low power radio service through lawsuits. It has announced intentions to file numerous Freedom of Information Act (FOIA) requests with the Commission in order to scrutinize the way it arrived at the decision to pursue LPFM. By doing so, the NAB has unwittingly revealed the porous nature of all of its arguments discussed so far in this reply comment, as well as its complete disregard for the minimal lip service it currently gives to 'public service.' Instead of being confident in the position it's adopted on this matter, the NAB is planning to lose, and is preparing to challenge LPFM in another venue outside of the Commission's jurisdiction. It would be an entertaining development to note if it wasn't so serious.

Finally, there is the Congressional aspect to the NAB's war on legal low power radio. As the most powerful lobby in Washington, D.C., the NAB has spent millions of dollars buying the influence of Representatives and Senators from both parties. It has been a major financial force behind those key Congressmen that most directly influence the formulation of American communication policy; most notably Rep. Billy Tauzin (R-La.), chair of the Telecommunications Subcommittee of the House's Commerce Committee, who has already threatened to cut the FCC's funding if it moves forward on the LPFM proposal. There is also the case of Senator John McCain (R-Az.), who occupies another important position within Congress in regards to the FCC - as chair of the Senate's Commerce Committee. He has publicly taken Chairman Kennard to task for pursuing this proposal.

Both of these men, elected to do the supposed will of the people, are subverting it because of the copious financial support they've received from the NAB helping them to remain in office. The NAB has also spent large amounts of time recently on Capitol Hill 'educating' other key members of Congress and their staffers on the dangers LPFM presents to the broadcast industry. It is

now clear that the NAB is calling in its chips, mobilizing those in Congress to potentially defeat LPFM through legislation. As an advocate of low power radio, I can only hope that the Commission finishes its work on this before Chairman Kennard's term in office expires, because of the enemies he's made.

There is a tongue-in-cheek saying within the broadcast industry, "If you can't beat 'em, buy 'em," and apparently holds true in the American political system as well. It is unfortunate - but it should not deter the Commission from pursuing policy in the public interest.

VI. REPLY TO REPLY COMMENTS FROM J. RODGER SKINNER, JR.

This is a very difficult issue for me. It is utterly disheartening to see the author of one of the two original proposals that spurred MM 99-25 attempt to marginalize and discredit a large segment of LPFM advocates. Mr. Skinner's first attack comes under the allegation that the majority of other pro-LPFM commenters are unlicensed broadcasters; the second is his desire for the Commission to preferentially treat the opinions of those with substantial radio engineering knowledge - those like himself - and discount the opinions of those not as enlightened.

I, apparently, would fall within this group he labels 'pirate radio interests,' due to my indelible sin of operating an unlicensed station for approximately three weeks when I was 16, as I openly described in my original comments. Not only is Mr. Skinner being overly judgmental and arrogant here, but his insinuation that the majority of pro-LPFM commenters in the MM 99-25 debate is patently false. In attempting to discredit the contributions of numerous other LPFM advocates nationwide, Mr. Skinner has woefully undone much of the other good work he has accomplished in his quest to make low power radio a reality.

I challenge Mr. Skinner to produce real data to back up his accusations that most of the LPFM advocates that have filed comments in this proceeding "come from the illegal 'pirate' background." He simply cannot do it, and he knows he can't. Instead, he is attempting to brush off the thoughts and opinions of thousands of people, many of whom have never engaged in any form of broadcasting whatsoever.

Probably the most glaring example of Mr. Skinner's ignorance about the background of other pro-LPFM commenters is his equation of these supposed 'pirate interests' (and, incidentally, any and all proponents of a strictly non-commercial service) with Stephen Dunifer, who's been represented in legal matters involving the Commission by the National Lawyer's Guild Committee on Democratic Communications. While the NLG-CDC did file comments on MM 99-25, it did not do so on behalf of Stephen Dunifer, who publicly stated upon the release of MM 99-25 that he would have no part of the proceedings. Just because his legal firm filed comments does not make it a party to unlicensed broadcasting - it is as if Mr. Skinner's claiming that a man who disputes a misdemeanor charge in court - and is represented by an attorney who's also had a notorious murderer as a client - is a murderer himself. These allegations by Mr. Skinner are illogical and unsubstantiated, and completely contrary to the intelligence he has demonstrated in the more technical matters regarding this proposal.

Another erroneous assertion made by Mr. Skinner is that one of the country's largest LPFM advocacy groups, the Amherst Alliance, also represents 'pirate interests.' Being one of the observers of Amherst's initial organization effort, I can vouch for the fact that nothing can be further from the truth. In fact, the issue of allowing unlicensed broadcasters to join the Amherst Alliance was a contentious one among the organization's leadership. The decision to allow them in the group was made with the reasoning that if the Amherst Alliance was going to be a true representative of the diverse breadth of people who support LPFM, it would not serve to disenfranchise many of those who helped bring the LPFM discussion along. Like it or not, the civil disobedience these unlicensed broadcasters have demonstrated has forced this issue before the



Commission - attempting to ignore this is only one more instance of Mr. Skinner attempting to co-opt what is the work of a national grassroots effort into his own personal accomplishment.

Ultimately, while Mr. Skinner would like the Commission to give the opinions of many other LPFM advocates "less weight," he has damaged his own credibility in the eyes of potential allies. It disappoints me to have to take a fellow proponent of MM 99-25 to task, but repeated attempts by myself and other LPFM advocates to forge some sort of public discourse with Mr. Skinner have proved to be utterly pointless, met with condescending vitriol for attempting to further perspectives that do not meet with his own lockstep vision for low power radio. I am heartened by the fact that the overwhelming majority of the American public is much more open-minded about this proposal than he has been or ever will be - fortunately, this includes the Commission.

Whereas extraordinary diversity would be an asset among other movements, the LPFM advocacy movement has been hurt by its inability to speak with one voice. This allows the closed-minded and insecure among 'the opposition' to attempt to marginalize many of the arguments brought forward during this proceeding by lumping non-'pirate' LPFM advocates in with current unlicensed broadcasts. Unfortunately, Mr. Skinner would have you legalize low power radio for himself and those exactly like him, and not for the rest of us. The reason is obvious - Mr. Skinner looks at low power radio solely as a business opportunity.

As the owner and operator of a financially struggling low power television station, Mr. Skinner sees low power radio as a way to cut his losses for making a bad business decision. It has nothing to do with opening access to the airwaves or increasing the diversity of voices available to the listening public, or even operating in the public interest - it has everything to do with making Mr. Skinner realize his unfulfilled dream of running a broadcast property he can live on. The dismissive and egotistical tone of Mr. Skinner's reply comments in regards to other LPFM advocate opinions casts a cloud on many of his accomplishments, and the Commission should take that into consideration when considering Mr. Skinner's overall input toward the creation of this service.

#### VII. CONCLUSION

While the Commission's progress to date on MM 99-25 has been optimistic, now is the time to take the proposal and turn it into policy. I welcome further discourse with the Commission on this issue, and hope its action is a positive one.

If you decide to further modify the proposal and allow more public comment on it, I strongly urge the Commission to consider bona-fide public hearings on the matter. For my part, I would take the time off from work and incur the financial burden to travel to Washington, D.C. and personally present my argument; I sincerely believe that there are many others who would do the same. It may present the only true opportunity for the Commission to fully understand just how widespread support is for low power radio across all demographic boundaries, and to recognize the real needs that exist and the opportunities it will create to rectify those needs.

Hopefully, all of this effort will not have been for naught. Please proceed responsibly.

Respectfully Submitted,

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